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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
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NEW YORK, NY 10007-1866

FEB 10 2006

Via fax

Anthony Cinque, P.E.  
Case Manager  
Bureau of Federal Case Management  
New Jersey Department of Environmental Protection  
401 East State Street, Trenton NJ 08625

Re: Review of the Post Remedial Monitoring Plan, L.E. Carpenter Site, Wharton, Morris County, NJ, dated October 2005

Dear Mr Cinque:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced work plan, prepared by RMT on behalf of L.E. Carpenter & Company, for the L.E. Carpenter Superfund Site, and is pleased to provide the following comments for your consideration.

First, it is greatly noted that considerable work, expense, and progress went into the major achievements made during 2005, with respect to removing lead and PCB contaminated soils, process wastes, as well as much of the LNAPL free product, in an effort to restore the site. There are, however, several important continuing concerns regarding the MW-19 area, which include the possibility for vapor intrusion across Ross Street, as well as the observed significant increase in monitored concentrations reported during 2005, which had been subsequently relayed to the New Jersey Department of Environmental Protection (NJDEP). At the time, EPA had recommended that a more aggressive remedial approach be initiated in the MW-19 area to address these concerns. These same concerns and comments were similarly expressed in a subsequent letter the NJDEP addressed to the PRP's consultant in December 2005. In response, on February 11, 2006, RMT submitted a Quarterly Monitoring Report, 4th Quarter 2005, dated February 2006. This new report discusses both the vapor intrusion and MW-19 area. The new report states that the question of whether active remediation should be considered for the MW-19 area will not be addressed until completion of the soil vapor intrusion evaluation and a verified reproducible down-gradient clean zone has been established in greater detail. While this is not the preferred approach, it is EPA's understanding that the NJDEP has received and approved the Post Remedial Monitoring Plan, but a formal review and comment letter is anticipated from the EPA.

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As noted, EPA had several reservations regarding the October 2005 plan, however, the enhanced monitoring activities that have been proposed in the just received February 2006 report, appears to address most of those concerns. Therefore, based on the information provided in the newly received February Quarterly Monitoring Report (2006), EPA concurs with additional installation of MW-19-12 at the revised location.

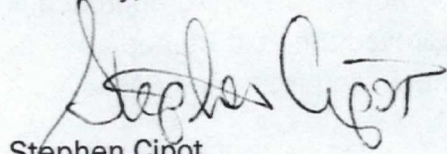
However, it must also be noted that not all EPA's concerns have been addressed in the MW-19 area. It would not only seem more efficient and cost effective over all to actively remediate the MW-19 area now, and thus mitigate vapor intrusion concerns and the further spreading of contaminants, but there is considerable delay involved with continuing to sample and install new monitoring points and wells, and wait for the results. The EPA continues to strongly believe that the utilization of a relatively simple technology such as dual phase extraction (DPE), or other technology which could be quickly evaluated by the PRP and presented in a new proposal, would save considerable time and effort, be overall more efficient, and address possible concerns for human health and the environment that may otherwise arise in the future. It should be noted that the USTs in the MW-19 area were removed 15 years ago, yet significant impacts to groundwater are ongoing.

It should also be considered that with the completion of the 2005 Source Reduction remediation, there may well be marked changes in shallow groundwater flow which could exacerbate the MW-19 area. The potential effect downgradient of the cement-bentonite slurry monolith was discussed in the October 2005 Post Remedial Monitoring Report, however, the overall affects are not presently known with respect to surface recharge and groundwater flow, and it may be some time before a new groundwater flow pattern stabilizes.

Therefore, based on the above, EPA recommends approval of the Post Remedial Monitoring Plan, with the incorporation of the enhanced monitoring proposal as outlined in the February 2006 Quarterly Monitoring Report. However, the EPA additionally requests that a revised submittal be presented as a final document which incorporates the updated new information from the February 2006 Quarterly Monitoring Report. Moreover, EPA strongly recommends that serious consideration for the active remediation of the MW-19 area not be put off much longer.

Thank you for the opportunity to review the above work plan. If you have any questions or comments on the above, please do not hesitate to contact me at (212) 637-4411.

Sincerely,

A handwritten signature in dark ink, appearing to read "Stephen Cipot", is written over the typed name.

Stephen Cipot  
Remedial Project Manager